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May 2, 2023

VIA ECF

Hon. J. Paul Oetken
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Noel Sanabria, 21-cr-313 (JPO)

Dear Judge Oetken:

I am CJA counsel to Noel Sanabria. I write to respectfully request a modification to Mr. Sanabria's bail conditions to permit him to travel on May 13, 2023 to Hackensack, New Jersey to take his mother to his brother's gravesite, and to spend May 14, 2023, Mother's Day, with his mother.

The government has informed defense counsel that it defers to Pre-Trial Services. Pre-Trial Services has informed counsel that it is their position to object to social leave for defendants on home detention. The undersigned is somewhat surprised by Pre-Trial's position given that they had no objection to Mr. Sanabria's previous request to spend Mother's Day in 2022 with his mother or to his previous request to take his mother to his brother's gravesite. See ECF # 87, 184. The Court granted both requests, see id., and Mr. Sanabria has been fully compliant with the terms of his release.

Accordingly, Mr. Sanabria respectfully requests that he be permitted to leave his home on May 13, 2023 at 9am and return by 6pm so that he may take his mother to his brother's gravesite in Hackensack, New Jersey, and to leave his home on May 14, 2023 at 11am and return by 10pm to spend Mother's Day with his mother.

Thank you for your consideration in this matter. I am, of course, available to provide more information at the Court's convenience.

Respectfully submitted,

/s/

David S. Greenfield

cc: All Parties (via ECF)
Pre-Trial Services Officer Viosanny Harrison (via email)

Granted.
So ordered.
5/2/2023



J. PAUL OETKEN
United States District Judge